

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
MACON DIVISION

UNITED STATES OF AMERICA : INDICTMENT  
v. : CRIMINAL NO. 5:18-CR-24-LJA-CHW  
KIMBERLY BROWN : VIOLATION:  
18 U.S.C. § 1204  
THE GRAND JURY CHARGES:

COUNT ONE

**(International Parental Kidnapping)**

That beginning on or about October 13, 2012, and continuing through on or about October 15, 2012, in the Middle District of Georgia and elsewhere within and outside the jurisdiction of the Court,

**KIMBERLY BROWN**

did remove a child from the United States with the intent to obstruct the lawful exercise of the parental rights of the child's father; all in violation of Title 18, United States Code, Section 1204.

A TRUE BILL.

/s/ Foreperson of the Grand Jury  
FOREPERSON OF THE GRAND JURY

PRESENTED BY:

CHARLES E. PEELER  
UNITED STATES ATTORNEY

  
ELIZABETH S. HOWARD  
ASSISTANT UNITED STATES ATTORNEY

Filed in open court this 14 day of March, AD 2018.

  
Deputy Clerk